

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

First-Class Mail and Periodicals
Service Standard Changes, 2021

Docket No. N2021-1

STEVE HUTKINS
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO
UNITED STATES POSTAL SERVICE FOR WITNESS HAGENSTEIN

(May 18, 2021)

Pursuant to 39 C.F.R. § 3010.311, I hereby submit interrogatories and requests for production of documents to United States Postal Service witness Stephen B. Hagenstein.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

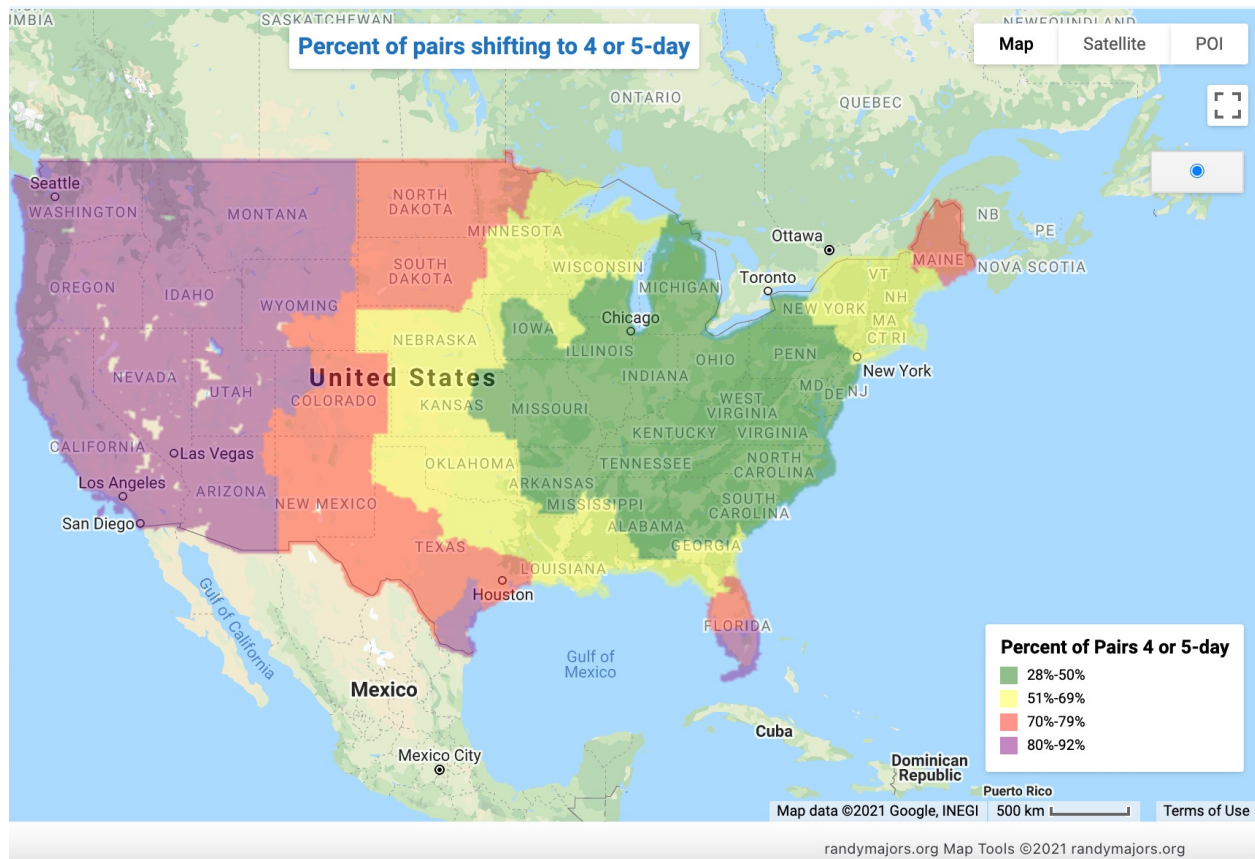
The instructions contained in my interrogatories to witness Hagenstein, SH/USPS-T-3-1-5, are incorporated herein by reference.

Respectfully submitted,

Dated: May 18, 2021

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SH/USPS-T-3-1. Please consider the following map showing the distribution of 4- and 5-day OD pairs across the contiguous U.S.¹ Please confirm that the map appears to be a reasonably accurate representation of what will occur under the Postal Service's plan, e.g., the western part of the country will see a much larger percentage of 4- and 5-day pairs than the eastern part of the country. If not confirmed, please explain.



SH/USPS-T-3-2. Please refer to Commission Report: Complaint on First-Class Mail Standards, Docket No. C2001-3, April 17, 2006, which dealt with the changes in service standards made in 2000-2001. Please refer to p. 2, section 1006, where the Commission stated the following:

Conclusions are also mixed because the record indicates that service under the adjusted standards appears to have improved for some postal patrons. However, many postal patrons in the western part of the Nation experienced a

¹ The data set used to create this map was derived from USPS-LR-N2021-1-3, Excel sheet entitled "3_Zip3_OD_Pairs.xlsx," by totaling the 4 and 5-day pairs for each 3-digit zip. This data can be found on Google Drive at <https://bit.ly/3osPgT5>. The map was created using a mapping tool at [randymajors.org](https://bit.ly/3wgXkl2). For closer inspection, an interactive version of the map can be found at <https://bit.ly/3wgXkl2>.

disproportionate number of service downgrades. Thus, the delivery service under the realignment resulted in a degree of unfairness and undue discrimination under section 403(c) for these patrons.

Please also refer to Commission Report, Appendix C, p. 12, section 38, where the Commission stated the following:

The Commission finds that the Complainant's assertions of undue discrimination, to the extent they involve delivery in California and other locales in the Pacific and Western areas, have merit. The Service's approach and application of the new model, given its underlying assumptions, resulted in a degree of unfairness that was clearly unintended, but nevertheless real. Geography, network design, and distances all play legitimate roles in determining service standards, but the Service's starting point — which, among other things, proceeded without public involvement and eliminated air transportation from initial determinations — exhibits an inappropriate degree of arbitrariness with respect to delivery in the areas Mr. Carlson highlights. The results, in turn, also impede the Service's ability to meet the mandate of section 101(a), which exhorts the Service "... to provide prompt, reliable, and efficient services to patrons in all areas...."

Please discuss the similarities and differences between the 2000-2001 changes in standards and changes described in the current proposal, and please explain why the differences are such that the Commission would have no reason to find that the current proposal also results in "undue discrimination" under 403(c) and impedes the Postal Service's ability to meet the mandate of section 101(a).

SH/USPS-T-3-3. Has the Postal Service performed or commissioned any studies that would address issues involving the potential for unintentional geographic discrimination caused by the proposed changes? If so, please provide the results of these studies.

SH/USPS-T-3-4. Please refer to USPS-LR-N2021-1-3, Excel sheet entitled "3_Zip3_OD_Pairs.xlsx," and USPS-LR-N2021-1-1, Excel spreadsheet "1_P.Mode_Mapping.xlsx." Please provide an Excel spreadsheet that contains all of the data in the OD pair sheet with two additional columns, one for the mode data (air, surface, etc.) from the mode mapping sheet and one that shows the mode of transportation *after* the plan is implemented.

SH/USPS-T-3-5: Please provide an Excel spreadsheet that contains the following: (a) originating 3-digit prefix for the 903 OD pairs in the contiguous U.S., as presented in USPS-LR-N2021-1-3, (b) total number of pairs currently 2-day, (c) total number of pairs currently 3-day, (d) total number of 2-day pairs under proposal, (e) total number of 3-day pairs under proposal, (f) total number of 4-day pairs under proposal, (g) total number of 5-day pairs under proposal, (h) total volume for pairs currently 2-day, (i) total

volume for pairs currently 3-day, (j) total volume for pairs 2-day under proposal, (k) total volume for 3-day pairs under proposal, (l) total volume for 4-day pairs under proposal, and (m) total volume for 5-day pairs under proposal.